

MMAC Update on Maryland Medicaid's Implementation of CMS' Interoperability Rule

Molly K. Marra Medicaid Provider Services September 23, 2021

CMS Interoperability Rule Vision

"The CMS Interoperability and Patient Access final rule establishes policies ... to enable better patient access to their health information, improve interoperability and unleash innovation, while reducing burden on payers and providers. ... In a future where data flows freely and securely between payers, providers, and patients, we can achieve truly coordinated care, improved health outcomes, and reduced costs."

The Centers for Medicare and Medicaid Services (CMS)

https://www.cms.gov/newsroom/fact-sheets/interoperability-and-patient-access-fact-sheet



CMS Interoperability Rule Goals

This is the first step of a long journey ...

Systems speak with each other across entities by integrating Fast Healthcare Interoperability Resources (FHIR)

Providers and Payers
experience increased
efficiencies and reduced
costs

Data transparency adds clarity to provider/payer interaction to help all parties better understand and manage healthcare



Four key requirements of the CMS Interoperability Rule

- **Provider Directory API (7/1/21)** Makes provider directory information publicly available via a standards-based application programming interface (API), enabling developers to access information and create services in order to help patients find providers for care and treatment.
- Patient Access API (7/1/21) Allows patients to easily access their claims and encounter information, including cost, as well as a defined sub-set of clinical data through third-party applications of their choice.
- Payer-to-Payer API (1/1/22, new compliance date pending) Patients may request certain clinical data be shared from payer to payer to help their current payer create a cumulative health record.
- Medicare Data Exchange (4/1/22) Increases the frequency of enrollee data sharing between Medicaid and Medicare from monthly to daily.
- On the horizon:
 - **Prior Authorization (NPRM closed 1/4/21)** Streamlines processes related to prior authorizations to reduce burden on providers and patients, leaving more time for providers to focus on patient care.

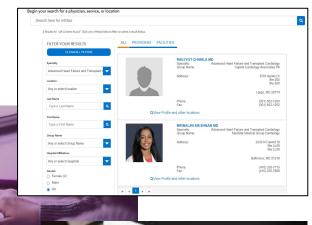


Provider Directory API

 Public-facing Provider Directory API with public facing digital endpoint (not the same as a portal)

 CMS's goal is that third parties can incorporate Medicaid provider information into their directories on websites and/or apps

- Provider Directory data at launch Includes:
 - Name
 - o Phone
 - Address
 - Provider Specialty/Type
- Later additions to Provider Directory data will include:
 - Web site URL
 - Accepting new patients
 - Cultural and linguistic capabilities
 - Accommodations for physical disabilities





Patient Access API Serves Patient Once Apps Register



- Medicaid participant downloads a third-party app (e.g., Apple Health).
- Following user authentication and authorization, the third-party app displays Medicaid claims data and pharmacy preferred drug list on the participant's mobile device.
- Includes somatic, dental, behavioral health, and pharmacy claims data, as well as HealthChoice encounters.
- Future enhancements could offer the patient access to more of their health data through leveraging clinical data sharing with CRISP.



Status of Maryland Medicaid's Implementation

- Partnering with Maryland's Health Information Exchange, CRISP, to implement APIs
- Part of Medicaid Enterprise System Modular Transformation (MMT) ProjectProvider
 Directory API Implemented early July
- Patient Access API Expecting mid-October for ages 18 and up
 - Ability for our participants to access this API depends on third party apps attesting
 - Outreach to apps underway
- Each MCO is responsible for standing up their own Provider Directory and Patient Access APIs



Status of MCO Implementation

- Three MCOs went live with Provider Directory and Patient Access APIs by July 1,
 2021
- Two MCOs went live with Provider Directory in July but have experienced delays with Patient Access
 - Most have targeted go-live for Patient Access APIs this fall
- Remaining four MCOs have experienced delays with implementation of both APIs due to complications with their chosen vendors; awaiting new go-live dates.



Patient Access and Provider Directory

Just the beginning of the journey...



Contact Information

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